

***Federal Transit Administration
Title VI Program***

Greene County Transit

Approved September 10, 2024

Title VI Plan Table of Contents

The Greene County Transit Title VI plan includes the following elements:

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Section 1: Title VI Plan Approval

Title VI Plan Adopted on: September 10, 2024

Adopted by: Greene County Board of Commissioners

Signature(s): 

Approval: Board action taken by unanimous vote at the Greene County Board of Commissioners' September 2024 regular monthly meeting. Minutes pictured in following pages.

GREENE COUNTY BOARD OF COMMISSIONERS

**REGULAR MONTHLY MEETING
SEPTEMBER 2024**

SEPTEMBER 10, 2024 MEETING:

Chairman Usry led the Pledge of Allegiance and the invocation.

Call to Order: Chairman Usry called the meeting to order at 5:00 p.m.

Roll Call: Commissioners Deering, Smith, Lindsey, Filice and Chairman Usry were present. Also present was County Manager Byron Lombard.

Chairman Usry then stated that he, with the entire Board's consent, was adding a resolution to the agenda to recognize the service and ultimate sacrifice of Greene County Fire Rescue Battalion Chief Chris Eddy. Commissioner Lindsey motioned to adopt Resolution 2024.9.10(b) recognizing the service and ultimate sacrifice of Greene County Fire Rescue Battalion Chief Chris Eddy. All Commissioners seconded the motion. Chairman Usry then asked Chris Edwards to come read the resolution aloud for the record while everyone stood. Motion carried unanimously. Chairman Usry then thanked Fire Chief Rodney Wiggins and all the firefighters and first responders for their service. The audience then stood once again and applauded the first responders.

Minutes: The Chairman inquired with the Commissioners to determine if any corrections were necessary for the minutes under consideration for approval. Commissioner Smith motioned to approve the Minutes from the August 2024 Regular Monthly Meeting, and the August 9, 2024 Called Meeting. Commissioner Lindsey seconded. Motion carried unanimously.

Zoning & Subdivision Items:

Consideration of a Rezoning Request – Bandit Holdings, LLC, 3400 & 3560 Hwy 77 S, A1 to LI: The Commissioners received background information that Bandit Holdings is seeking to rezone 68.41 acres, ultimately intending to build a 100,000 square foot warehouse for the storage of corrugated boxes. Commissioner Lindsey motioned to approve the rezoning request submitted by Bandit Holdings, LLC amending the Zoning from A1 to LI for the 68.41 acres located on Highway 77 South identified as tax map and parcel numbers 126-0-00-036-0 and 125-0-00-027-0, contingent upon the removal of the manufactured home that is currently located on one of the parcels. Commissioner Deering seconded. Motion carried unanimously.

Consideration of a Conditional Use Request – HDP Investments, LLC, Guest House: The Commissioners received background information that HDP Investments is seeking to obtain a conditional use to construct a guest house at 1551 Bennett Springs Drive. Commissioner Filice motioned to approve the Conditional Use request submitted by HDP Investments, LLC, permitting a guest house on the parcel located at 1551 Bennett Springs Drive in the Reynolds Lake Oconee Development. Commissioner Lindsey seconded. Commissioner Smith asked why the construction of a guest house required a conditional use, and County Manager Lombard stated that guest houses are allowed as permitted uses in larger PUD developments but are only allowed as a conditional use in regular PUD zoning. Motion carried unanimously.

Business Items:

Consideration of Appointments to the Courthouse Vacant Space Allocation Committee: The Commissioners received background information that it was time to appoint the five-person Courthouse Vacant Space Allocation Committee, and Chairman Usry asked each Commissioner to name their proposed appointee to the Committee. Commissioner Deering motioned to appoint the following individuals to serve on the

Courthouse Vacant Space Allocation Committee: Deborah Jackson, Laverne Ogletree, Lee Rhodes, Bill Posey, and Jim Sweeney. Terry Lawler spoke and said he was looking forward to the Committee's future efforts. Commissioner Lindsey seconded. Commissioners Lindsey acknowledged that there was much interest in the Committee and thanked those willing to serve, reminding everyone that the meetings are open, public meetings. Motion carried unanimously.

Consideration of the Title VI Plan – Transit Services: The Commissioners received background information that the Federal Transit Administration requires that the County update its Title VI Plan to continue receiving various federal funds to operate the 5311 Transit program and other related transportation programs. Commissioner Smith motioned to approve the Greene County Transit Title VI Plan. Commissioner Lindsey seconded. Motion carried unanimously.

Consideration of a Resolution Adopting Fire Department Agreements: The Commissioners received background information that the framework whereby the contracts for the private, non-profit fire departments are addressed annually with the County's fiscal year. The contracts establish the legal mechanism through which the County can provide these entities funding through the tax districts. The Agreements with the volunteer departments include Greshamville, Walker Church, and Liberty. Commissioner Deering motioned to approve Resolution Number 2024.9.10 Adopting Agreements with Private, Non-Profit Fire Departments, and to waive the reading of the Resolution. Commissioner Lindsey seconded. Motion carried unanimously.

Consideration of a Contract with the Chamber of Commerce: The Commissioners received background information that the County enters into a contract annually with the Chamber of Commerce for provision of specified services. The financial encumbrance for the contract was included in the Budget. Commissioner Deering motioned to approve the contract with the Chamber of Commerce for the County's Fiscal Year 2025. Commissioner Filice seconded. There was discussion regarding how often the County gets audits and financial reports from the Chamber. Motion carried unanimously.

Consideration of the Enterprise Fleet Program Contracts: The Commissioners received background information that County staff and the County Attorney will need to execute contracts to utilize Enterprise Fleet Management to acquire and maintain the County's fleet of vehicles as discussed during budget meetings. Commissioner Lindsey motioned to approve the contracts and corresponding Addendums with Enterprise Fleet Management Trust including the Master Equity Lease Agreement, Maintenance Management and Fleet Rental Agreement, and the Full Maintenance Agreement. Commissioner Deering seconded. There was general discussion as to how much equipment can be transferred between Sheriff's Office vehicles. Motion carried unanimously.

Consideration of the Memorandum of Agreement with the NEGRC for CDBG Services: The Commissioners received background information that the Northeast Georgia Regional Commission will help develop the application and administration services related to the pursuit of a Community Development Block Grant to construct an addition to the Senior Center. Linda Kimble spoke concerning the project and its scope. Commissioner Lindsey motioned to approve the Memorandum of Agreement between the Northeast Georgia Regional Commission and Greene County for application and administration services in connection with the Community Development Block Grant Project to expand the Senior Center. Commissioner Smith seconded. There was general discussion over the timeline of the project should it be approved. Motion carried unanimously.

Consideration of the FY25 Tentative Allocation Letter for the Airport: The Commissioners received background information that the proposed projects at the Greene County Regional Airport require a five percent match from the County and letter attesting to said match. Commissioner Filice motioned to approve the commitment of matching funds totaling \$108,847.00 from SPLOST for an estimated \$1,833,334.00 in Airport Projects, and the submission of a letter confirming the commitment to the Georgia

Department of Transportation. Commissioner Lindsey seconded. There was general discussion about the projects to be funded. Motion carried unanimously.

Consideration of the Airport Obstruction Clearing and Fencing Project: The Commissioners received background information that the project to grade down a site on the West end of the runway and install fencing is now ready to move forward. Commissioner Lindsey motioned to authorize the execution of a Contract for Construction of Airport with the Georgia Department of Transportation for Project Number AP025-9089-43(133) PID T007955, and to approve the necessary budget adjustments to account for the grant revenue and local match expense with the local match coming from SPLOST proceeds. Commissioner Filice seconded. Commissioner Lindsey commented that he is amazed with the volume of traffic at the Airport, and there was additional discussion regarding the T-hangar project. Motion carried unanimously.

Consideration of Budget Adjustments: The Commissioners received background information that various budget adjustments for Fiscal Year 2024 were prepared for the Board's consideration. Commissioner Deering motioned to approve the necessary budget adjustments for the 2024 Fiscal Year as detailed on the submitted budget amendment forms. Commissioner Lindsey seconded. Motion carried unanimously.

Consideration of a SPLOST Expenditure – Fire Department: The Commissioners received background information that some items requested by the Fire department during the Fiscal Year 2025 budget process weren't included but that some items were appropriate capital purchases using SPLOST funding. Commissioner Filice motioned to allocate \$229,650.93 in additional funding in SPLOST VII for Fire Department Purposes, and to approve the use of the funding to purchase defibrillators, a breathing air apparatus, and spare airpack cylinders. Commissioner Smith seconded. Motion carried unanimously.

Commissioner's Reports:

District Three Commissioner Lindsey said he appreciated the County's public safety first responders and recognized the outpouring of love and support for the public safety community in the wake of Chris Eddy's death.

Executive Session:

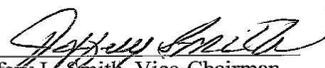
Adjournment: Chairman Usry adjourned the meeting at 5:36 p.m.

Respectfully Submitted,

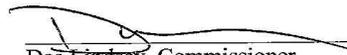

Sylvia V. Hill, County Clerk

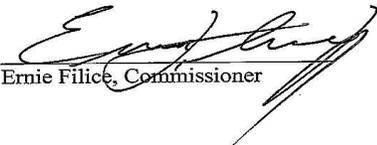
The above minutes were adopted and approved this day 8th day of October, 2024.


Gary Usry, Chairman


Jeffery L. Smith, Vice-Chairman


Angela Walker Deering, Commissioner


Dee Lindsey, Commissioner


Ernie Filice, Commissioner

Section 2: Title VI Policy Statement

Policy Statement

Greene County Transit, operating as a public transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Georgia Department of Transportation (GDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and GDOT Public Transportation requirements as specified in Master

Grant Agreement, and State Management Plan. Greene County Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section 3: Title VI Notice to the Public

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Greene County Transit

- Greene County Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Greene County Transit.
- For more information on Greene County Transit's civil rights program or Title VI obligations, the procedures for, or to file a complaint, please contact:

Chris Edwards, Title VI Coordinator
706-453-7716, (TTY 711)

Email: cedwards@greencountyga.gov;

Or visit our administrative office at

1034 Silver Drive, Suite 201, Greensboro, GA 30642

For more information, visit **www.greencountyga.gov/transit**

- For transportation-related Title VI matters, a complaint may also be filed directly with GDOT's Equal Employment Opportunity Office: Title VI Liaison, 600 West Peachtree Street N.W. Atlanta, GA 30308; via phone: 404-631-1972; TTY: 711 or email: civilrights@dot.ga.gov

or to

- Federal Transit Administration, Office of Civil Rights, Director
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC, 20590.
- If information is needed in another language, contact 706-453-2321.

The **Greene County Transit** Notice to the Public is posted in the following locations:

1. Greene County Transit's website
2. Greene County Transit's reception desk and meeting rooms
3. Transit vehicles

Section 4: Title VI Complaint Procedure

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by Greene County Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

If the complainant is unable to reduce the complaint to writing, please contact the Title VI Coordinator using the information below, and a staff member will help dictate the complaint or provide other necessary assistance.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with Greene County Transit no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, Greene County Transit will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the agency's Title VI Coordinator. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

Greene County Transit has 60 days to investigate the complaint. If more information is needed to resolve the case, the Greene County Transit may contact the complainant requesting further information. The complainant has **15** business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within **15** business days, Greene County Transit can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision it must direct the appeal back to the agency. The complainant has **30** days after receipt of the closure letter or the letter of finding to do so. The appeal will be investigated and decided by a separate party than the Title VI Coordinator (or other official who issued the initial decision). The appeal process information will be included in the letter.

Written Title VI Complaints, or any questions regarding Title VI protections, should be forwarded to:

Chris Edwards, Title VI Coordinator
706-453-7716, (TTY 711)

Email: Cedwards@greenecountyga.gov;

Or visit our administrative office at

1034 Silver Drive, Suite 201, Greensboro, GA 30642

For more information, visit **www.greenecountyga.gov/transit**

For transportation-related Title VI matters, a complaint may also be filed directly with GDOT's Equal Employment Opportunity Office: Title VI Liaison, 600 West Peachtree Street N.W. Atlanta, GA 30308; via phone: 404-631-1972; TTY: 711 or email: civilrights@dot.ga.gov

Or

Federal Transit Administration, Office of Civil Rights, Director
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, please contact **706-453-2321**.

Section 5: Title VI Complaint Form

**Greene County Transit
Title VI Complaint Form**

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				

I believe the discrimination I experienced was based on (check all that apply):

Title VI: **Race** **Color** **National Origin**

Other (specify): _____

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV

Have you previously filed a Civil Rights related complaint with this agency?

Yes

No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court _____

State Agency _____

State Court _____

Local Agency _____

If marked Yes in Section V, please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:
Telephone:
Section VI
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

**Greene County Transit
Chris Edwards, Title VI Coordinator
1034 Silver Drive, Suite 201,
Greensboro, GA 30642
706-453-7716
Email: cedwards@greencountyga.gov;**

Section 6: List of Title VI Investigations, Complaints and Lawsuits

The Greene County Transit maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

- There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.
- There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Section 7: Public Participation Plan

Greene County Transit's *Public Involvement Philosophy*

Greene County Transit welcomes and values public involvement. GDOT and its recipients believe that well-designed, proactive public involvement improves its planning and policy efforts and ultimately leads to better decisions, better projects, and maximized, long-term public benefits. Creating long-term, sustainable systems requires our agency to embrace outside skills and knowledge, including input from the public. Advantages of enhanced public involvement include:

- Increased public collaboration. Citizen collaboration on projects benefits our agency's processes and outcomes, promoting public participation and respectful, productive dialogue.
- Decisions that better reflect diverse interests. Consulting with all identifiable interests helps Greene County Transit better understand and reflect the full range of community values and livability standards.
- Efficient transportation decision implementation. Early public involvement fosters better decision making and reduces costly project plan revisions and change orders.
- Enhanced agency credibility. Increased public involvement results in more meaningful and better interactions between Department personnel and customers. This interaction aids everyone. The agency better understands public concerns, and customers gain an appreciation of the agency and its responsibilities.
- Greene County Transit proactively involves the public in addressing transportation issues. The agency communicates to the widest audience possible and considers feedback received from transportation stakeholders and the public.

The agency embraces several specific goals:

- Provide for open and continuous communication to incorporate public input into decision-making and inform the public of planning, program functions, project activities, designs, and construction.
- Consult with local governments in identifying transportation needs, coordinating projects, and selecting viable solutions.
- Respond quickly and transparently to concerns expressed about agency activities and educate the public about transportation programs and issues.
- Continuously evaluate public outreach activity effectiveness.
- Ensure minorities and low-income populations have opportunities to participate in the public involvement process.
- Foster internal communication and training to promote public involvement process understanding and implementation.

Strategies and Desired Outcomes

To promote inclusive public participation, Greene County Transit will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

In addition to these general strategies, Greene County Transit has also employed these specific strategies or activities:

- In-vehicle advertisement
- Posters or flyers in transit center

- Posting information on website
- Press releases and briefings to media outlets
- Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
- Communications to relevant elected officials
- Other methods required by local or state laws or agreements

Public Outreach Activities

The public outreach and involvement activities conducted by Greene County Transit since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

Event Date	Greene County Transit Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
Ongoing	TPO	Brochure developed and distributed in community and meeting places	Brochure	Re=supplied periodically
Ongoing	County staff	Articles and press releases sent to papers	articles	
10/11/2023	Title VI Coordinator	NEGRC transit roundtable	In-person meeting	Also have had subsequent discussions with State and other agencies about expanding Transit to underserved groups

Section 8: Four Factor Analysis and LEP Data

What does it mean to be Limited English Proficient (LEP)?

LEP individuals do not speak English as their primary language and therefore have a limited ability to read, write, speak, or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information in English.

Background

Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person's inability to speak, read, write or understand English. Recipients of Federal funds must provide meaningful access to LEP individuals.

On August 11, 2000, Executive Order 13166, titled, "Improving Access to Services by Persons with Limited English Proficiency," was issued. Executive Order 13166 requires Federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each Federal department or agency "to prepare a plan to improve access to...Federally conducted programs and activities by eligible LEP persons...."

Framework for Deciding when Language Services are Needed

Greene County Transit will take the following steps to ensure meaningful access to its programs, services, and activities for LEP individuals in a manner that balances the following four factors.

FOUR-FACTOR ANALYSIS

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the agency;
2. The frequency with which LEP persons come into contact with the agency's services and programs;
3. The nature and importance of the agency's services and programs in people's lives; and
4. The resources available to the agency for LEP outreach, as well as the costs associated with that outreach.

Factor One: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by Greene County Transit

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter our agency's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, the agency evaluated the level of English proficiency and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census and the American Community Survey. The most recent data available for the state were the ACS 2018-2022 five-year estimates.

Service Area Overview

Greene County Transit service area encompasses Greene County, Georgia. Home to 18,186 people spread over 388 square miles, the service area's population speaks 12 different language groups. However, the overall numbers of residents who speak English 'less than very well' are very low. Of the total service area population of 18,186, 168, or 0.09% of the

population of residents, report speaking English less than very well. A breakdown of the language groups, and those speaking English less than very well, are shown below.

	Greene County, Georgia	
Label	Estimate	
Total:	18,186	
Speak only English	16,990	93.42%
Speak Spanish, and English less than "very well"	116	0.64%
Speak Russian, Polish, or other Slavic languages; and English less than "very well"	20	0.11%
Speak Other Indo-European languages; and English less than "very well"	13	0.07%
Speak Chinese (incl. Mandarin, Cantonese); and English less than "very well"	6	0.03%
Speak Tagalog (incl. Filipino); and English less than "very well"	4	0.02%
Speak Other Asian and Pacific Island languages; and English less than "very well"	9	0.05%

<https://data.census.gov/cedsci/> **Table C16001**

The Safe Harbor Provision

The U.S. Department of Transportation (U.S. DOT) has adopted the U.S. Department of Justice’s Safe Harbor Provision. This provision outlines circumstances that can provide a “safe harbor” for U.S. DOT recipients (and sub-recipients) regarding translation of vital documents. Specifically, if a recipient provides written translation of vital documents for each LEP group that constitutes the lesser of 1,000 persons or five percent (5%) of the total population eligible to be served or likely to be affected or encountered, such action is considered strong evidence of compliance with the recipient’s written translation obligations.

The Safe Harbor Provision only applies to the translation of written documents. It does not affect the agency's requirement to provide meaningful access to LEP individuals through oral language services.

A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

The data above shows that no languages meet the Safe Harbor threshold

The number of people who speak other languages and English less than very well all comprise under 0.1% of the population each.

Designation of Vital Documents

Based on the limited population of Spanish speakers who also speak English less than very well, no languages meet the Safe Harbor Threshold in our service area. The agency is therefore not designating any vital documents at this time. However, any unmet language needs will still be met as described in the Language Access Plan, below.

Factor Two: The frequency with which LEP persons come into contact with Agency services and programs.

Greene County Transit recognizes the importance of taking measures to gauge LEP needs, but in the spirit of transparency, admits it has done less than planned in the past few years to fortify the Title VI Program. In this situation, our agency is doing all it can to move forward in a positive direction. Staff and the County's third party operator will collect data on the frequency in which LEP persons come into contact with the agency's various departments and programs. The Title VI Coordinator will periodically survey Transit drivers and other staff regarding contact with LEP persons. Title VI Coordinator will review and analyze this data each year. All Transit staff will also be asked to log their use of any type of Language

Line or any other translation or interpretation services. Thus, by the time this Program is due for an update, Greene County Transit will have concrete data on language access needs to help direct future efforts and planning.

Factor Three: The Importance of the Agency's Service to People's Lives

Greene County Transit services likely affect every community member in some way. Our transit services are used daily by people who do not have access to their own transportation. Our services allow riders access to grocery stores, medical appointments, work, social service agencies, social activities, and a variety of other essential destinations. Some LEP persons are immigrants with no legal way to access a driver's license at this time.

Finally, Greene County Transit's planning process relies on input from the public. The agency's services are therefore important to LEP person's lives, and must be accessible to everyone, regardless of ability to speak English.

Factor Four: Resources and Costs for LEP Outreach

Given that Greene County Transit has a very limited number of LEP citizens, we can meet the needs of its LEP population through relatively simple means. First, Greene County Transit staff members who speak Spanish or any other foreign languages can be consulted or utilized for translation or interpretation in informal or emergency situations. In the event assistance in a rare language is needed, Greene County Transit can reach out to local colleges or universities to find staff who are proficient and may be willing to assist. Other free resources include the use of Google Translate or other technology-based translation services. Our agency can utilize Google Translate to interpret simple comments or messages left on our social media or in real time if necessary to communicate without advance warning an interpreter is needed.

Greene County Transit recognizes there will be times when professional interpretation or translation services are needed. In those cases where a citizen needs to communicate with us in another language, the Title VI Coordinator will engage the third party operator and a telephonic interpretation service to facilitate the needs of LEP persons.

Finally, Greene County Transit will pay for document translation services when needed, which generally costs about \$25-\$35 per page.

These resources give our agency the ability to perform outreach with the LEP population at a reasonable cost.

Section 9: Language Assistance Plan

As a recipient of federal US DOT funding, Greene County Transit is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **Greene County Transit's** Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Results: LEP Populations Served

Item #1 – Four Factor Analysis Results: LEP Populations Served
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The data above shows that no languages meet the Safe Harbor threshold

The number of people who speak other languages and English less than very well all comprise under 0.1% of the population each.

Item # 2 – Description of how Language Assistance Services are Provided, by Language
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The Greene County Transit will engage the contracted third party operator and a telephonic interpretation service to facilitate the needs of LEP persons. Additionally, Greene County Transit will pay for document translation services when needed, which generally costs about \$25-\$35 per page.

Item #3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of Greene County Transit’s language assistance measures, Greene County Transit provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.

Item #4 – Description of how the Language Assistance Plan is Monitored and Updated

Greene County Transit will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the Greene County Transit service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Greene County Transit’s financial resources are sufficient to fund language assistance resources needed.
- Determine whether Greene County Transit has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Greene County Transit’s failure to meet the needs of LEP individuals

Item #5 – Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will be provided to Greene County Transit staff:

- Information on the Greene County Transit Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of “I Speak” language cards (used to identify language preference).
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

“I Speak” Language Identification Card

Note: For additional languages visit the US Census Bureau website

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaø oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöô.	Vietnamese
	당신이 한 국어 말 할 경우 이 상자를 표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
		Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

<http://www.lep.gov/ISpeakCards2004.pdf>

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 10: Minority Representation Information

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, *the membership of which is selected by the recipient*, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Greene County Transit does not have any transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient. This section is inapplicable.

Section 11: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Section 12: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility?

- No, the agency has not built a facility.

- Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

Section 13: Fixed Route Transit Providers Service Standards and Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

Greene County Transit:

is a fixed route transit provider

is **not** a fixed route transit provider